

1 Scott E. Gizer, Esq., Nevada Bar No. 12216
2 *sgizer@earlysullivan.com*
3 Sophia S. Lau, Esq., Nevada Bar No. 13365
4 *slau@earlysullivan.com*
5 EARLY SULLIVAN WRIGHT
6 GIZER & McRAE LLP
7 8716 Spanish Ridge Avenue, Suite 105
8 Las Vegas, Nevada 89148
9 Telephone: (702) 331-7593
10 Facsimile: (702) 331-1652

11 Kevin S. Sinclair, NV Bar No. 12277
12 *ksinclair@sinclairbraun.com*
13 SINCLAIR BRAUN LLP
14 16501 Ventura Blvd, Suite 400
15 Encino, California 91436
16 Telephone: (213) 429-6100
17 Facsimile: (213) 429-6101

18 Attorneys for Defendants
19 FIDELITY NATIONAL TITLE GROUP, INC., CHICAGO
20 TITLE INSURANCE COMPANY, and CHICAGO TITLE OF
21 NEVADA, INC.

22 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
23 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

24 Gary L. Compton, State Bar No. 1652
25 2950 E. Flamingo Road, Suite L
26 Las Vegas, Nevada 89121

27 **UNITED STATES DISTRICT COURT**

28 **DISTRICT OF NEVADA**

US BANK, NATIONAL ASSOCIATION,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,
INC. et al.,

Defendants.

Case No.: 2:21-CV-00455-GMN-BNW

**STIPULATION AND ORDER TO
EXTEND TIME TO REPLY IN
SUPPORT OF MOTIONS TO DISMISS
AND OPPOSE COUNTERMOTION
FOR PARTIAL SUMMARY
JUDGMENT (ECF Nos. 30-32, 41)**

COMES NOW defendants Fidelity National Title Group, Inc. ("FNTG"), Chicago Title Insurance Company ("Chicago Title"), and Chicago Title of Nevada, Inc. ("Chicago Agency") (collectively "Defendants") and plaintiff U.S. Bank National Association ("U.S. Bank"), by and through their respective attorneys of record, which hereby agree and stipulate as follows:

1 1. On March 18, 2021, U.S. Bank filed its complaint in the Eighth Judicial District
2 Court for the State of Nevada;

3 2. On March 18, 2021, Chicago Title removed the instant case to the United States
4 District Court for the State of Nevada (ECF No. 1);

5 3. June 15, 2021, FNTG, Chicago Title, and Chicago Agency moved to dismiss U.S.
6 Bank's complaint (ECF Nos. 30-32);

7 4. On July 13, 2021, U.S. Bank filed its responses to FNTG, Chicago Title, and
8 Chicago Agency's motions to dismiss (ECF Nos. 38-40) and filed a counter-motion for partial
9 summary judgment to Chicago Title's motion to dismiss (ECF No. 41);

10 5. Defendants request a four-week extension of their respective deadlines to reply in
11 support of the motions to dismiss and a two-week extension of Chicago Title's deadline to oppose
12 the counter-motion for summary judgment, through and including Tuesday, August 17, 2021 (such
13 that all of Defendants' replies and the opposition are due on that date), to afford Defendants'
14 counsel additional time to review and respond to U.S. Bank's oppositions and counter-motion.

15 6. Counsel for U.S. Bank does not oppose the requested extension;

16 7. This is the first request for an extension made by counsel for Defendants, which is
17 made in good faith and not for the purposes of delay.

18 //

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26 //

27 //

28 //

1 **IT IS SO STIPULATED** that Defendants' respective deadlines to reply in support of
2 their motions to dismiss and oppose U.S. Bank's countermotion is hereby extended through and
3 including Tuesday, August 17, 2021.

4 Dated: July 14, 2021

SINCLAIR BRAUN LLP

6 By: /s/-Kevin S. Sinclair
7 KEVIN S. SINCLAIR
8 Attorneys for Defendants
9 FIDELITY NATIONAL TITLE GROUP,
INC., CHICAGO TITLE INSURANCE
COMPANY, and CHICAGO TITLE OF
NEVADA, INC.

10 Dated: July 14, 2021

WRIGHT FINLAY & ZAK, LLP

12 By: /s/-Christina V. Miller
13 CHRISTINA V. MILLER
14 Attorneys for Plaintiff
15 U.S. BANK NATIONAL ASSOCIATION

17 **IT IS SO ORDERED.**

18 Dated this 16 day of July, 2021.

19 
20 _____
21 Gloria M. Navarro, District Judge
22 UNITED STATES DISTRICT COURT
23
24
25
26
27
28